

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE

RACHEL RAMSBOTTOM,	)	
ALEXIS BOWLING,	)	
JENNA HOUSTON, JANE DOE #1	)	
	)	
Plaintiffs,	)	<b>CIVIL ACTION NO. 3:21-cv-00272</b>
	)	
v.	)	<b>JURY TRIAL DEMANDED</b>
	)	
LORIN ASHTON, AMORPHOUS	)	
MUSIC, INC., BASSNECTAR	)	
TOURING, INC., REDLIGHT	)	
MANAGEMENT, INC., C3 PRESENTS,	)	
L.L.C, INTERACTIVE GIVING FUND,	)	
GNARLOS INDUSTRIES, LLC,	)	<b>JUDGE ALETA A. TRAUGER</b>
CARLOS DONOHUE, ABC	)	
CORPORATIONS, ONE THROUGH	)	
TEN (said Names Being Fictitious),	)	
JOHN DOES, ONE THROUGH TEN	)	
(said Names Being Fictitious),	)	
	)	
Defendants.	)	
	)	

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**DECLARATION OF MITCHELL SCHUSTER IN SUPPORT OF AMORPHOUS MUSIC  
INC.'S AND BASSNECTAR TOURING, INC.'S RULE 12(b)(2), 12(b)(3) AND 12(b)(6)  
MOTION TO DISMISS PLAINTIFFS' FIRST AMENDED COMPLAINT**

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I, Mitchell Schuster, state as follows:

1. Defendant Amorphous Music, Inc. (“AMI”) is a corporation that was formed under the laws of the State of California on July 20, 2007. A true copy of the Articles of Incorporation of AMI is attached as **Exhibit A**.
2. According to a Business Information Search on the Tennessee Secretary of State website (<https://tnbear.tn.gov/Ecommerce/FilingSearch.aspx>) (“TN Sec of State Website”), AMI is not currently, nor was it ever, registered to do business in the State of Tennessee. A true copy of the search results for AMI on the TN Sec of State Website, completed on July 15, 2021, indicating no records is attached as **Exhibit B**.

3. Defendant Bassnectar Touring, Inc. ("BTI") is a corporation that was formed under the laws of the State of Delaware on September 10, 2010. A true copy of the Articles of Incorporation of BTI is attached as **Exhibit C**.

4. According to the TN Sec of State Website, BTI is not currently, nor was it ever, registered to do business in the State of Tennessee. A true copy of the search results for BTI on the TN Sec of State Website, completed on July 15, 2021, indicating no records are attached as **Exhibit D**.

5. I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct



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MITCHELL SCHUSTER

Dated: July 16, 2021

Respectfully Submitted,

s/ Robert A. Peal

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## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and exact copy of the foregoing was served on the following counsel via the Court's CM/ECF system on this 16th day of July, 2021:

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*Attorneys for Defendant Interactive Giving  
Fund*

*s/ Robert A. Peal* \_\_\_\_\_